

Momanaee, Audrey F.

From: Stuart Lapp <slapp@stibbsco.com>
Sent: Friday, July 29, 2022 11:43 AM
To: Momanaee, Audrey F.; Josh Redelman; brian.baker@stacybakerlaw.com
Subject: RE: Conference, Garza

[External Email] Please use caution.

Audrey:

I assumed you meant Josh and not Jared but thank you for the clarification.

I am working on dates and availability for continuation of the NOV corporate rep 30(b)(6) deposition. Are there any dates that do not work for you? I am available at 2:00 pm to discuss.

Stuart W. Lapp

Managing Partner

Stibbs & Co., P.C., Attorneys

819 Crossbridge Dr., Spring, Texas 77373

P: 281-367-2222 F: 281-681-2330

D: 281-323-6040 C: 713-416-6233

slapp@stibbsco.com | www.stibbsco.com



Please consider the environment before printing this e-mail

Stibbs & Co. team members are intentionally copied on this email. Please “reply all” to all such team members. Failure to do so may cause delay.

IMPORTANT/CONFIDENTIAL: This transmission from the law firm of Stibbs & Co., P.C. is intended only for the use of the addresses shown. It contains information that may be privileged, confidential, and/or exempt from disclosure under applicable law. If you are not the intended recipient of this transmission, you are hereby notified that the copying, use, or distribution of any information or materials transmitted herewith is strictly prohibited. If you have received this e-mail by mistake, please immediately respond to this e-mail to notify the sender.

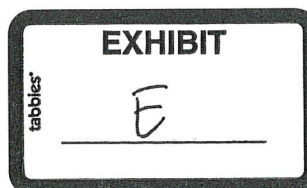
From: Momanaee, Audrey F. <amomanaee@balch.com>

Sent: Friday, July 29, 2022 11:32 AM

To: Stuart Lapp <slapp@stibbsco.com>; Josh Redelman <jredelman@stibbsco.com>; brian.baker@stacybakerlaw.com

Subject: RE: Conference, Garza

Excuse me – I spoke to Josh.



Audrey

From: Momanaee, Audrey F. <amomanaee@balch.com>

Sent: Friday, July 29, 2022 11:20 AM

To: Stuart Lapp <slapp@stibbsco.com>; 'Josh Redelman' <jredelman@stibbsco.com>; brian.baker@stacybakerlaw.com

Subject: Conference, Garza

Stuart,

I spoke with Jared yesterday afternoon and understand from him that you all do not intend to replead, or request withdrawal or dismissal of your assertions in your live Complaint relative to damages. He said that I should be able to ask for a motion in limine at the time of trial which would protect my client's rights. I don't think that's how it works, so we will proceed on a motion requesting relief from the Court.

He let me know that I needed to speak with you about the corporate representative deposition (I have not heard back in response to my requests for deposition dates given Mr. Ortego's inability to answer my questions) and Varco's refusal to adequately respond to discovery requests. Can you be available at 2p this afternoon to discuss?

Thanks,

Audrey



Audrey F. Momanaee, Partner, Balch & Bingham LLP
811 Louisiana Street • Suite 1010 • Houston, TX 77002
t: (713) 362-2557 f: (866) 230-9950 e: amomanaee@balch.com
www.balch.com

CONFIDENTIALITY: This email and any attachments may be confidential and/or privileged and are therefore protected against copying, use, disclosure or distribution. If you are not the intended recipient, please notify us immediately by replying to the sender and double deleting this copy and the reply from your system.